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MR. HALSTEAD: For the record, I am Bob Halstead, Transportation Advisor for the State of Nevada Agency for Nuclear Projects.

At this morning's session I distributed some copies of a prepared statement which has a number of tables and maps showing in detail the numbers of shipments and the routes through California, and specifically through San Bernardino County. I still have some copies available.

Tonight I'd like to quickly comment on two issues that came up during the question-and-answer period, and since I left my notes, I'll retrieve them. It's funny, when I was younger I used to be able to do this without notes.

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One question was severe accidents which the Department of Energy considered.

The answer that Steve Maheras gave wasn't incorrect, but he might have noted that the modal study, which is the nuclear regulatory accident study that DOE depends on, was published in the mid-1980's, and it only considered severe accidents that had occurred up until about 1983. There have been a number of severe accidents that we feel would have challenged cask integrity since then. One of them you may remember was in 1992 when there was a rail accident here in San Bernardino that involved a high-speed derailment on top of a pipeline, and that created the kind of combination of impact forces and long duration fire that the State of Nevada is very concerned about.

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The second issue that came up in the question-and-answer period involved cask testing. Again, I don't think there was any intent to deceive on the part of the Department of Energy people answering the question, but they gave the impression that casks had been tested to meet the NRC performance standards but they hadn't been tested to performance thresholds.

In fact, there's no legal requirement for full-scale testing. None of the casks have been tested to see if they meet the NRC performance standards. DOE has no plans to do full-scale testing of the casks.

The State of Nevada has sought full-scale testing as a requirement for ten years, and indeed the California legislature passed legislation sponsored by Senate Majority Leader Sheila Kuehl, but that bill died for lack of signature by outgoing governor, Governor Wilson.

Now, turning to the issue of routing. I would like to conclude my comments tonight by talking about the way the Department of Energy dealt with routes and the way the State of Nevada believes that DOE should have dealt with routes.

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Now, this is the map that DOE posted on their website (indicating) about four or five weeks ago; and it shows the routes that were actually evaluated in the Draft EIS.

Nowhere in the Draft EIS do they specifically identify these routes, and they didn't do this in their notices, but you can see that basically the entire freeway system through the L.A. basin would be used. And also you can see that both the north-south rail lines, the U.P. and the old Santa Fe -- now the Burlington Northern Santa Fe lines -- and also the Burlington Northern Santa Fe and Union Pacific lines coming in from Arizona.

Now, we believe that the Department of Energy should have, A, shown you the routes that they actually used; B, they should have said of these routes which were the most likely ones if the shipments started tomorrow; C, if certain change occurred and states designate alternate routes, then what would the most likely routes be. And finally, they should have identified the number of shipments that were likely to use each route.

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Now, the State of Nevada feels that this is a fair criticism on our part because, in fact, we have been doing parallel independent routing studies for the last ten years, and we will be submitting some detailed comments on these routes on Monday. But again, the routes that we think are most important are among the ones that DOE examined, but it doesn't just stop with what routes are legally or technically feasible.

We have to first go beyond that and look, for example, in Nevada, that since 1988 Nevada has been looking at all the routes that would avoid using I-15 from Utah and I-15 from California, because obviously that puts those shipments through Las Vegas -- whether it's downtown through the old Spaghetti Bowl intersection -- or we believe it is likely that the State of Nevada Transportation Board will avoid shipments through Las Vegas. That has implications for the points of entry to Nevada, and it has, in turn, big implications for the State of California.

Similarly, Nevada had looked at other factors like, for example, which routes have already been designated for other federal shipments where the first responders have already started to receive emergency response training, for example, along the routes going to the waste isolation pilot plant facility in New Mexico. And we think in the end, under the privatized system that the Department of Energy is proposing, in order for people to make money shipping waste across the country, they are going to not only have to comply with all the route designations in Nevada, but they are going to use the routes where people have already been trained and consolidate the shipments.

The bottom line for California is this: The likely east-west is I-40 from Nashville, Tennessee, across the country into Barstow, then going back east on I-15. The most likely heavily impacted rail route we believe is the old Santa Fe -- now the Burlington Northern Santa Fe route -- that comes -- the main line is from Kansas City into Daggett, through San Bernardino, where it catches the Union Pacific main line that comes out of L.A. And again, those shipments would go back to the east to Nevada. The numbers of shipments I have laid out in my statement.

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It's for these reasons, not just looking at the way shipments would go if they started tomorrow -- but trying to look at the factors that might shape the most likely routes that would be used over the life of the repository, it's in that area that we feel the Environmental Impact Statement is most deficient and doesn't provide information to officials in states like California and counties like San Bernardino that they need.

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Again, as I said earlier, I would like to congratulate the facilitators for the way that they have managed these meetings. I also would like to congratulate the DOE staff. I may disagree with the leadership of the Department of Energy and the way they make decisions in the Forrestal Building in Washington, but the people on the road conducting these hearings have done an admirable job both of taking input from the public and managing to keep their cool over several months.

Thank you very much.

FACILITATOR LAWSON: Thank you, Bob.

Our next speaker is Corbin Harney. Mr. Harney will be followed by Grace Lester and John Cadek.

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